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EEN: USAO 2024R00322

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

KAMEL HAY,

Defendant

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CRIMINAL NO. 24-cr-00188-TDC

(Involuntary Manslaughter,
18 U.S.C. §§ 7 and 1112(b);
Driving Under the Influence of
Alcohol, 36 C.F.R. § 4.23;
Reckless Driving,
36 C.F.R. § 4.2, Assimilating Md.
Transp. Art. § 21-901.1)

INDICTMENT

COUNT ONE

(Involuntary Manslaughter)

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The Grand Jury for the District of Maryland charges that:

On or about February 5, 2022, in the District of Maryland, the defendant,

KAMEL HAY,

on lands within the special maritime and territorial jurisdiction of the United States, did unlawfully kill Victim One in the commission of an unlawful act not amounting to a felony, to wit: (1) operating a motor vehicle while the alcohol concentration in his blood was 0.08 grams or more of alcohol per 100 milliliters of blood, and (2) driving a vehicle in a manner that indicated a wanton and willful disregard for the safety of persons and property, in violation of 36 C.F.R. §§ 4.23 and 4.2, assimilating Md. Transp. Art. § 21-901.1(a).

18 U.S.C. § 1112(b)
18 U.S.C. § 7

COUNT TWO
(Driving Under the Influence of Alcohol)

The Grand Jury for the District of Maryland further charges that:

On or about February 5, 2022, in the District of Maryland, the defendant,

KAMEL HAY,

on lands administered by the National Park Service, did operate a motor vehicle while under the influence of alcohol to a degree that rendered him incapable of safe operation and while the alcohol concentration in his blood was 0.08 grams or more of alcohol per 100 milliliters of blood.

36 C.F.R. § 4.23

COUNT THREE
(Reckless Driving)

The Grand Jury for the District of Maryland further charges that:

On or about February 5, 2022, in the District of Maryland, the defendant,

KAMEL HAY,

on lands administered by the National Park Service, did drive a motor vehicle in a manner that indicated a wanton and willful disregard for the safety of persons and property.

36 C.F.R. § 4.2,
Md. Transp. Art. § 21-901.1(a)

 EN

Erek L. Barron
United States Attorney

•A TRUE BILL•

SIGNATURE REDACTED

Date: 6-6-24